



OT-0416

Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue, Pittsfield, MA 01201

*Transmitted via Federal Express*

August 16, 2001

Bryan Olson  
EPA Project Coordinator  
U.S. Environmental Protection Agency  
EPA New England  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Plant Site 1 Groundwater Management Area (GECD310)  
Modifications to Baseline Monitoring Program**

Dear Mr. Olson:

By letter of May 18, 2001, the General Electric Company (GE) provided an update on its inventory and installation of monitoring wells for the baseline groundwater monitoring program for the Plant Site 1 Groundwater Management Area (GMA 1) and proposed several modifications to the wells in that program. By letter of July 9, 2001, the U.S. Environmental Protection Agency (EPA) approved those proposed modifications subject to a number of conditions. Thereafter, during discussions between GE and EPA and in a site meeting and walkover on July 18, 2001, attended by representatives of GE and EPA as well as the Massachusetts Department of Environmental Protection (MDEP), EPA agreed to certain clarifications and modifications to the conditions in its July 9, 2001 letter. The present letter documents the clarifications and modifications to EPA's July 9, 2001 letter that have been agreed to by GE and EPA. In addition, this letter describes certain other modifications relating to replacement wells in GMA 1, including those that were agreed upon by GE and EPA at the site meeting and others that are proposed herein based on more recent information.

**Clarifications/Modifications to EPA's Conditional Approval Letter**

In discussions between GE and EPA and at the July 18 site meeting, EPA has agreed to the following clarifications and modifications to the conditions in its July 9, 2001 letter:

**Condition 1: Re-Surveying of Existing Wells** - This condition directed GE to re-survey a number of listed wells. At the July 18 site meeting, EPA agreed that certain of these wells may be eliminated from re-surveying, as they have been removed from the GMA 1 program or have already been re-surveyed by GE or the discrepancy between measured and previously reported dimensions could be explained. Specifically, it was agreed that GE will re-survey only the following wells, where a discrepancy of greater than 0.1 foot and surficial damage or heaving were noted: wells 64, 95-9, ES2-2A, ES2-17, ES1-10, LSSC-18, NS-9, and MM-1.

**Condition 2: Removal of Foreign Matter from Existing Wells During Redevelopment** - This condition stated that, as part of developing or redeveloping all wells that will be sampled during the GMA 1 baseline monitoring program, accumulated silt will be removed from all such wells. As GE noted at the meeting, GE intends to do that and has initiated this task. If the analytical results following the initial sampling event indicate the potential for sample contamination due to foreign matter in a well which could not be removed during redevelopment, GE will further address the well(s) in question as part of its evaluation of the analytical data, and may propose to replace any such wells at that time.

**Condition 3: Location of Well GMA1-11** - This condition directed GE not to install replacement well GMA1-11 at the location proposed by GE, but rather within or just downgradient of the former 12F Tank Farm. At the meeting, a new location for this well was agreed upon and marked in the field. Well GMA1-11 was installed on August 6, 2001.

**Condition 4: Assessment of LNAPL at Well 95-20** - This condition stated that a trace of LNAPL was detected during the inventory of this well. However, as GE noted, only a slight sheen and odor were noted on the well inventory record for this well. GE agreed to recheck this well for LNAPL, as stated in this condition. Following the July 18 meeting, well redevelopment activities have been performed at this well. During these activities, no NAPL was observed during initial measurements or in the groundwater which was removed during development. Therefore, GE does not propose to change the quarterly monitoring frequency at this well.

**Condition 5: GW-3 Monitoring at Well HR-G1-MW-3** - As discussed during the meeting, well HR-G1-MW-2 was erroneously indicated as a GW-3 perimeter well on the figure which accompanied GE's May 18, 2001 update letter. In accordance with EPA Condition 5, GE will utilize well HR-G1-MW-3 for GW-3 monitoring in this area.

**Condition 6: Additional GW-2 Monitoring at Newell Street Area I** - This condition stated that additional GW-2 compliance wells are needed at Newell Street Area I and it proposed use of wells IA-9R and FW-16R for that purpose. These wells are currently slated for GW-3 perimeter monitoring, but are not near occupied buildings. At the meeting, EPA agreed that GE need not add these wells (or any other new wells at Newell Street Area I) as designated GW-2 compliance wells at this time. As discussed during the meeting, GE will continue to utilize these wells for GW-3 perimeter monitoring purposes, which will include analysis of the constituents for which GW-2 standards exist. Although these wells will not be classified or reported as GW-2 compliance points, EPA reserves the right to request that additional wells be installed near buildings in this area, if warranted following review of the analytical results from these wells.

**Condition 7: EPA Oversight of Activities** - As stated in this condition, GE will continue to coordinate with EPA/Weston to provide notification of upcoming GMA 1 baseline monitoring program activities to enable the scheduling of EPA oversight personnel.

#### Other Replacement Well Locations

In addition to the above clarifications and modifications to the conditions in EPA's July 9, 2001 letter, a number of other replacement well locations were discussed and examined and/or modified in the field during the July 18 site visit. A summary and update regarding these replacement wells is provided below.

**Wells Outside Current Merrill Road Construction Area** - During the site visit, GE and EPA identified several locations of proposed replacement wells which are outside the current Merrill Road construction

area and thus are capable of being installed at this time. These consisted of wells P-R, M-R, 25-R, QQ-R, B-1R, MW-6R, and 37R. GE has installed the first four of these wells as of the present date. During utility location activities for replacement well B-1R, existing well B-2 was found in the vicinity. GE performed an inventory of this well, which indicated that the well appears to be usable for groundwater quality monitoring (although repairs to the surface cover will be required). Therefore, GE has proposed to utilize well B-2 in the GMA 1 baseline monitoring program instead of installing replacement well B-1R, and EPA has concurred with that change. GE will re-survey this well to resolve a discrepancy in its location on prior figures. During the July 18 meeting, it was agreed that the location of well MW-6R would be shifted onto the grassy right-of-way west of the entranceway to the auto dealership for safety purposes and to prevent damage to the well due to traffic entering the property. GE may need to further modify this well location due to the presence of utilities which power lights and signs in this area. Any change in the location is expected to be minor and GE anticipates that this well will be installed shortly. The status of well 37R is discussed below.

**Replacement Well 37R** - This well was originally intended to replace well 37, which was located in the center of Newell Street, between East Street and the Housatonic River. The well was planned to serve a dual purpose: (1) as a GW-2 monitoring point in the vicinity of several occupied buildings in East Street Area 1-South; and (2) to assess potential preferential pathways beneath Newell Street, as proposed in GE's January 11, 2001 *Supplemental Phase II Scope of Work for East Street Area 1-South*. However, following a walkover of this area, a suitable well location could not be identified which would accomplish the two goals listed above. Therefore, the location of well 37R was modified to be removed from the road further east into an open area between the buildings in this area to allow its use as a GW-2 well. GE has proposed an alternate approach to address potential preferential pathways in this area in its August 2, 2001 *Revised Supplemental Phase II Scope of Work for East Street Area 1-South*. GE will install well 37R after obtaining access from the property owner where the well will be located.

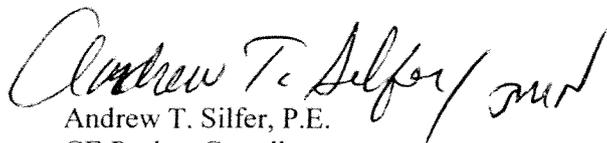
**Wells Within Active Merrill Road Construction Area** - During the site visit, certain other proposed replacement wells were identified as remaining within the active area of Merrill Road construction or equipment staging areas, and it was thus agreed that these wells cannot be installed at this time. These wells include: 60R, 72R, 31R, and LL-R. GE will continue to monitor construction activities and will endeavor to install these wells as construction is completed.

**Replacement Well 26R** - Finally, it appears that the location of replacement well 26R may fall within the footprint of the Future City Recreational Area to be constructed in East Street Area 2-South, given the design modifications that are being considered for this recreational area. Therefore, with EPA's concurrence, installation of this well will be delayed until the final design for the Future City Recreational Area is agreed upon by GE and the City. If necessary, GE may relocate this well slightly to ensure that it does not obstruct future remediation or construction activities in the Future City Recreational Area.

As stated in GE's May 18, 2001 update letter, GE will provide EPA with a letter reporting on all of the ongoing GMA 1 activities and propose any additional schedule modifications by August 23, 2001 (i.e., within 45 days from EPA's July 9, 2001 conditional approval letter).

Please call John Novotny or me if you have any questions regarding this letter or other activities related to the Plant Site 1 Groundwater Management Area.

Sincerely,



Andrew T. Silfer, P.E.  
GE Project Coordinator

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